

Jerald M. Cohen  
10 Hickory Drive  
Doylestown, PA 18901-4725  
267-337-7290  
JeraldMCohen@GMail.com

February 23, 2012

I am writing to present concerns, questions and thoughts for consideration and acceptance into comments on VRS reform. I am a Deaf consumer of VRS.

In regards to:

Subscribers vs. per minute reimbursement.

The current providers aggressively pursue consumers for their various services. This has created a mechanism that produces a LOT of information; fact and fiction.

Questions that I feel need to be answered regarding subscribers vs per minute reimbursements are:

1. If Subscriber rates are used to reimburse relay services would the consumer be permitted to use any provider they choose? Would they be allowed to have more than one provider?
2. How would consumers be recruited and registered? There should be guidelines for acceptable and unacceptable behaviors.
3. Would this generate enough revenue to maintain/improve and expand on the quality of services currently provided?
4. When you take into consideration basic law of economics, would it appear that subscriber rates will benefit VRS providers who have a sizeable chunk of the market? Would it squeeze out smaller providers or discourage new companies from starting up? The larger the consumer base the more money they will get. How can subscriber rates be established when there is no experience with this approach? Would this create a monopoly and promote antibusiness behaviors?
5. What about those who are not subscribers such as hearing consumers? How would VRS providers be reimbursed for those calls? What about sales calls created by VRS consumers? Would the subscriber rates adequately cover costs? What about Conference participation calls?

6. Would the consumer rights change under this approach?

7. Would FCC benefit from staying with per minute rates for 12 to 24 months and use this time to acquire data on trends, behaviors of consumers that use VRS such as types of calls, the length of each type of call and by region. Could these statistics be used for future consideration in looking at other monetary reimbursement methods?

I urge FCC to ask as many questions possible and seek answers. If the answers are not there wait, and stay with per minute reimbursements.

In regards to

VRS providers connection with the community:

1. When the rates were changed last year companies started crying poverty and sent out PR notices on the internet, phone calls and their staff speaking at various meetings that they were being hurt by the new rates and that they would have to cut/curtail services or worst get out of providing services altogether. Was this appropriate? It created hysteria. Should FCC set up strict guidelines of what can and cannot be communicated with the communities? All providers are paid by FCC therefore should FCC legislate appropriate publicity and dissemination of information?

2. Should VRS Reform address the quality of interpreters? It varies by region and state. There are regional and locational dialects and sign variations. Interpreters at one time or another appear to incorrectly/inadequately translate from sign to voice correctly 100% of the time. Should FCC require each call center have at least one Certified Deaf Interpreter on duty at all times so that would provide assistance to interpreters who struggle with some consumers receptive signs. This would assure quality services. Interpreters could deal with as many as 20 or 30 different modalities, thus creating a challenge for them to constantly switch gears.

3. Should FCC mandate a percentage of funds each VRS receives be used for ongoing intensive training? This would focus on improving the quality of interpreting and voicing accurately. Would utilizing a consumer based group to review and provide specific feedback and recommendations for training be beneficial?. This would be consumer driven Deaf, Hard of Hearing and general public consumers who frequently use VRS.

4. In essence, all interpreters should be certified and KNOW their limits. It is apparent that this is not

always so. When interpreters voice what they think I signed and then when I follow up with the person I talked to it becomes obvious that there was some misinformation. How can I as a consumer monitor this? Is training provided to interpreters on techniques for checking for understanding during VRS calls on a consistent basis?

5. In regards to messages left by the VRS, the quality of messages left by the interpreters are at times not clear and hard to read. Should VRS reform mandate that a mechanism that is easily accessible be put in place to allow the consumer to ask the VRS provider to translate the message

In regards to

Community Relations and Donations please give consideration to the following:

1. Nearly all of the VRS revenue comes from FCC. Many of the VRS companies give money to nonprofit and for profit organizations through paid advertising or sponsorship of events/activities. This sometimes locks out other companies from also sponsoring these community groups. Is this appropriate? Should VRS reform establish regulations that all VRS providers give back to the community equally without exclusivity agreements? Should VRS reform allow an organization to receive sponsorships from as many providers they want? Should these organizations meet some type of criteria such as being an entity recognized by the IRS, provide direct services and so forth?

2. Should FCC national and regional feedback sessions with consumers using non VRS organizations like National Association of the Deaf? Should FCC contract with them to gather all of these comments, summarize them and make recommendations to be shared with FCC? FCC then can share with VRS providers and communities it serves to encourage change. This information could help FCC determine updates and changes in regulations and rules. This is like a system of checks and balances for information sharing.

3. When there is a long waiting period while in calls (on hold) interpreters cannot use privacy screens, interpreters are seen doing things on the computer, reading, or on occasion talking to someone. Or laughing at something they hear, one can see their faces/mouths move which gives the assumption the person is back on the phone. During VCO calls such behavior appears to be more prevalent. This is clearly distracting and against general interpreter protocol on eye contact. What FCC regulations are there for this? Should there be a modicum of professional ethics and behaviors?

4. There is a rumor going around that many interpreters store information about consumers on these computers which can be helpful to the interpreter. Are other information placed on the computers such as warnings or caveats on certain consumers? Are there guidelines for such? How are VRS providers monitoring the downtime behaviors? What is allowed to be put and stored on these

computers?

Thank you for the opportunity to share. I am available for further discussions.

Thank you

Sincerely,

Jerald M Cohen